

EXHIBIT 69

From: [Michael Murphy](#)
To: [Zachary Hansen](#); [Michael Murphy, Jr.](#)
Cc: [Bryan Sullivan](#); [AbbeLowellPublicOutreach@winston.com](#); [Salvaty, Paul B.](#); [Ellis, Gregory A.](#); [Michael Murphy, Jr.](#); [Carmen](#)
Subject: RE: Robert Hunter Biden v. Patrick M. Byrne (Federal Case No.: 2:23-cv-09430-SVW-PD) -Motion for Summary Judgment/Adjudication
Date: Saturday, August 17, 2024 8:54:43 AM

Hi Zachary:

This e-mail is to provide you with notice that pursuant to FRCP 56, we intend to bring a motion for summary judgment and/or for summary adjudication of issues and within the next 60 days to ensure that the motion is timely and can be heard by the court before the pretrial conference and trial. I am giving you this notice to ensure that you have the opportunity to take whatever action you deem appropriate to get your discovery completed and so that you can address the issues set forth in our motion.

Have a great weekend.

Very truly yours,

Michael C. Murphy, Esq.

From: Michael Murphy
Sent: Saturday, August 17, 2024 8:45 AM
To: 'Zachary Hansen' <zhsansen@earlysullivan.com>; Michael Murphy, Jr. <michael.jr@murphlaw.net>
Cc: 'Bryan Sullivan' <bsullivan@earlysullivan.com>; 'AbbeLowellPublicOutreach@winston.com' <AbbeLowellPublicOutreach@winston.com>; 'Salvaty, Paul B.' <PSalvaty@winston.com>; 'Ellis, Gregory A.' <GAEllis@winston.com>; Michael Murphy, Jr. <michael.jr@murphlaw.net>; Carmen <Carmen@murphlaw.net>
Subject: RE: Robert Hunter Biden v. Patrick M. Byrne (Federal Case No.: 2:23-cv-09430-SVW-PD) - Ms. Biden as a Witness

Hi Zachary:

In your client's responses to our client's special interrogatory number 3, your client lists Mrs. Biden as a witness. She is not listed as a witness in your client's Rule 26f disclosures. If your client may call his wife as a witness during trial, he must list her in his Rule 26f disclosures and promptly produce her for a deposition. Otherwise, you must stipulate to a court order that your client will not be calling her to testify during the trial of this case.

Your client cannot claim the husband wife privilege to block us from deposing Ms. Biden and then waive that privilege right before trial and try to call her.